

**JUDGE KAPLAN**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA

-v.-

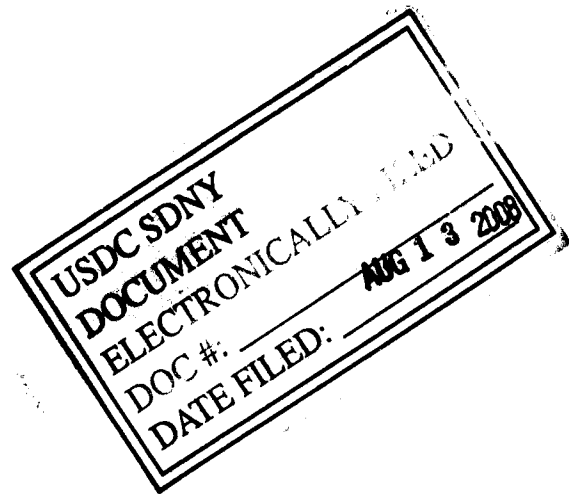
SAMUEL VILSHANETSKI,  
a/k/a "Dima,"  
SVIATOSLAV JADAN,  
a/k/a "Slava,"  
ROMILLA ANWAR,  
ANATOLIY SUNIK,  
ASNODIN DIANALAN,  
a/k/a "Dino,"  
RADION AMINOV,  
MARK POGORILER,  
a/k/a "Lobster,"  
ROMAN SATLER,  
a/k/a "Roma,"  
SHAMIL TAGIEV,  
a/k/a "Sammy,"  
VLADIMIR DUPONT,  
a/k/a "Vlad,"  
GENNADY BROYTMAN,  
a/k/a "Genna," and  
FELIKS KHATSELA,

Defendants.

INDICTMENT *RCB*

08 Cr.

**08 CRIM 751**



-----X  
COUNT ONE

The Grand Jury charges:

1. From in or about May 2006, up to and including in or about June 2008, in the Southern District of New York and elsewhere, SAMUEL VILSHANETSKI, a/k/a "Dima," SVIATOSLAV JADAN, a/k/a "Slava," ROMILLA ANWAR, ANATOLIY SUNIK, ASNODIN DIANALAN, a/k/a "Dino," RADION AMINOV, MARK POGORILER, a/k/a "Lobster," ROMAN SATLER, a/k/a "Roma," SHAMIL TAGIEV, a/k/a "Sammy," VLADIMIR DUPONT, a/k/a "Vlad," GENNADY BROYTMAN, a/k/a "Genna,"

and FELIKS KHATSELA, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Sections 1341, and 1347.

2. It was a part and an object of the conspiracy that SAMUEL VILSHANETSKI, a/k/a "Dima," SVIATOSLAV JADAN, a/k/a "Slava," ROMILLA ANWAR, ANATOLIY SUNIK, ASNODIN DIANALAN, a/k/a "Dino," RADION AMINOV, MARK POGORILER, a/k/a "Lobster," ROMAN SATLER, a/k/a "Roma," SHAMIL TAGIEV, a/k/a "Sammy," VLADIMIR DUPONT, a/k/a "Vlad," GENNADY BROYTMAN, a/k/a "Genna," and FELIKS KHATSELA, the defendants, and others known and unknown, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and would and did take and receive therefrom, such matter and thing, and would and did knowingly cause to be delivered by mail according to the direction thereon, and at the place at which it was directed to be delivered by the person to

whom it was addressed, such matter and thing, in violation of Title 18, United States Code, Section 1341.

3. It was further a part and an object of the conspiracy that SAMUEL VILSHANETSKI, a/k/a "Dima," SVIATOSLAV JADAN, a/k/a "Slava," ROMILLA ANWAR, ANATOLIY SUNIK, ASNODIN DIANALAN, a/k/a "Dino," RADION AMINOV, MARK POGORILER, a/k/a "Lobster," ROMAN SATLER, a/k/a "Roma," SHAMIL TAGIEV, a/k/a "Sammy," VLADIMIR DUPONT, a/k/a "Vlad," GENNADY BROITMAN, a/k/a "Genna," and FELIKS KHATSELA, the defendants, and others known and unknown, unlawfully, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud health care benefit programs and obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, health care benefit programs, in connection with the delivery of and payment for health care benefits, items and services, in violation of Title 18, United States Code, Section 1347.

(Title 18 United States Code, Section 1349.)

COUNT TWO

The Grand Jury further charges:

4. From in or about May 2006, up to and including in or about June 2008, in the Southern District of New York and elsewhere, SAMUEL VILSHANETSKI, a/k/a "Dima," SVIATOSLAV JADAN, a/k/a "Slava," ROMILLA ANWAR, ANATOLIY SUNIK, ASNODIN DIANALAN,

a/k/a "Dino," RADION AMINOV, MARK POGORILER, a/k/a "Lobster," ROMAN SATLER, a/k/a "Roma," SHAMIL TAGIEV, a/k/a "Sammy," VLADIMIR DUPONT, a/k/a "Vlad," GENNADY BROYTMAN, a/k/a "Genna," and FELIKS KHATSELA, the defendants, and others known and unknown, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, to wit, a scheme to defraud insurance companies and other entities by, among other things, submitting fraudulent insurance claims for medical services provided to persons purportedly injured in automobile accidents, for the purpose of executing such scheme and artifice and attempting so to do, did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and did take and receive therefrom, such matter and thing, and did knowingly cause to be delivered by mail according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, such matter and thing, to wit, correspondence in furtherance of fraudulent insurance claims mailed to insurers in New York and elsewhere.

(Title 18, United States Code, Sections 1341, and 2.)

COUNT THREE

The Grand Jury further charges:

5. From in or about May 2006, up to and including in or about June 2008, in the Southern District of New York and elsewhere, SAMUEL VILSHANETSKI, a/k/a "Dima," SVIATOSLAV JADAN, a/k/a "Slava," ROMILLA ANWAR, ANATOLIY SUNIK, ASNODIN DIANALAN, a/k/a "Dino," RADION AMINOV, MARK POGORILER, a/k/a "Lobster," ROMAN SATLER, a/k/a "Roma," SHAMIL TAGIEV, a/k/a "Sammy," VLADIMIR DUPONT, a/k/a "Vlad," GENNADY BROYTMAN, a/k/a "Genna," and FELIKS KHATSELA, the defendants, and others known and unknown, unlawfully, willfully and knowingly did execute, and attempt to execute, a scheme and artifice to defraud health care benefit programs and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, health care benefit programs, in connection with the delivery of and payment for health care benefits, items and services, to wit, a scheme to defraud insurance companies and other entities by, among other things, submitting fraudulent insurance claims for medical services provided to persons purportedly injured in automobile accidents.

(Title 18, United States Code, Sections 1347, and 2.)

#### Forfeiture Allegation

6. As a result of committing the offenses alleged in Counts One, Two, and Three of this Indictment, SAMUEL VILSHANETSKI, a/k/a "Dima," SVIATOSLAV JADAN, a/k/a "Slava,"

ROMILLA ANWAR, ANATOLIY SUNIK, ASNODIN DIANALAN, a/k/a "Dino," RADION AMINOV, MARK POGORILER, a/k/a "Lobster," ROMAN SATLER, a/k/a "Roma," SHAMIL TAGIEV, a/k/a "Sammy," VLADIMIR DUPONT, a/k/a "Vlad," GENNADY BROVTMAN, a/k/a "Genna," and FELIKS KHATSELA, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 982, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in this Indictment.

Substitute Asset Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of SAMUEL VILSHANETSKI, a/k/a "Dima," SVIATOSLAV JADAN, a/k/a "Slava," ROMILLA ANWAR, ANATOLIY SUNIK, ASNODIN DIANALAN, a/k/a "Dino," RADION AMINOV, MARK POGORILER, a/k/a "Lobster," ROMAN SATLER, a/k/a "Roma," SHAMIL TAGIEV, a/k/a "Sammy," VLADIMIR DUPONT, a/k/a "Vlad," GENNADY BROVTMAN, a/k/a "Genna," and FELIKS KHATSELA, the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

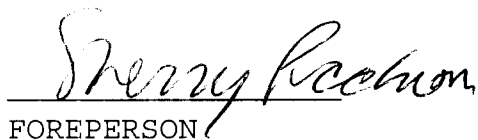
c. has been placed beyond the jurisdiction of the Court;

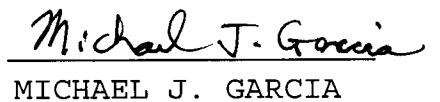
d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982, to seek forfeiture of any other property of SAMUEL VILSHANETSKI, a/k/a "Dima," SVIATOSLAV JADAN, a/k/a "Slava," ROMILLA ANWAR, ANATOLIY SUNIK, ASNODIN DIANALAN, a/k/a "Dino," RADION AMINOV, MARK POGORILER, a/k/a "Lobster," ROMAN SATLER, a/k/a "Roma," SHAMIL TAGIEV, a/k/a "Sammy," VLADIMIR DUPONT, a/k/a "Vlad," GENNADY BROYTMAN, a/k/a "Genna," and FELIKS KHATSELA, the defendants, up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

- v. -

SAMUEL VILSHANETSKI,  
a/k/a "Dima,"  
SVIATOSLAV JADAN,  
a/k/a "Slava,"  
ROMILLA ANWAR,  
ANATOLIY SUNIK,  
ASNODIN DIANALAN,  
a/k/a "Dino,"  
RADION AMINOV,  
MARK POGORILER,  
a/k/a "Lobster,"  
ROMAN SATLER,  
a/k/a "Roma,"  
SHAMIL TAGIEV,  
a/k/a "Sammy,"  
VLADIMIR DUPONT,  
a/k/a "Vlad,"  
GENNADY BROYTMAN,  
a/k/a "Genna," and  
FELIKS KHATSELA,  
Defendants.

---

INDICTMENT

08 Cr.

(18 U.S.C. §§ 1349; 1341; and 1347.)

---

MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

Foreperson.

*Sherry Picchioni*

*Indictment filed  
assigned to Judge Friedman  
8/13/08*

*8/13/08*